

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**AMBAC ASSURANCE CORPORATION AND FINANCIAL GUARANTY INSURANCE
COMPANY'S CROSS-NOTICE OF DEPOSITION OF DAVID SKEEL**

PLEASE TAKE NOTICE THAT, pursuant to Rule 30 of the Federal Rules of Civil Procedure, made applicable to these proceedings through Rule 9014 of the Federal Rules of Bankruptcy Procedure, in connection with the *Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (ECF No. 16741), filed on May 11, 2021, and in response to the *Official Committee of Unsecured Creditors' Notice of Deposition to David Skeel Pursuant to Fed. R. Civ. P. 30*, dated April 23, 2021, Ambac Assurance Corporation and Financial Guaranty Insurance Company, through their counsel, hereby issue this cross-notice that they will take the deposition upon oral examination of David Skeel.

The deposition will commence on June 8, 2021 at 9:00 a.m. EST, at a location to be determined by agreement of the parties or order of the Court. At the request of the witness, in lieu

¹ The Debtors in the jointly-administered Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (v) Puerto Rico Electric Power Authority ("PREPA") (Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

of an in-person appearance, the deposition may be conducted via video conference pursuant to an agreement of the parties. The deposition shall continue from day to day thereafter until completed or adjourned.

The deposition will take place before a notary public or other officer authorized to administer oaths and record testimony pursuant to Federal Rule of Civil Procedure 28. The deposition will be recorded by stenographic means and videotaped.

Dated: May 14, 2021
San Juan, Puerto Rico

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CERTIFICATE OF SERVICE

I hereby certify that, on this same date, the foregoing was served upon Mr. Skeel and the Financial Oversight and Management Board for Puerto Rico, through their counsel, via email.

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